

November 8, 2018

BY ELECTRONIC FILING

Ms. Marlene H. Dortch, Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

IN THE MATTER OF:)	
)	
GREEN DOT PUBLIC SCHOOLS)	CC Docket No. 02-6
BEN 16021229)	
GREEN DOT TENNESSEE CONSORTIUM)	
BEN 17008913)	
)	
2016 Form 471: 161048386)	
Funding Request: 1699110334)	
Form 472 (BEAR): 2815980)	

REQUEST FOR WAIVER OF INVOICING DEADLINE

Green Dot Public Schools (BEN 16021229) on behalf of Green Dot Tennessee Consortium (BEN 17008913) wishes to appeal the USAC invoice denial or in the alternate, request an FCC waiver for the invoicing deadline for 2016 Form 471: 161048386, FRN 1699110334, associated with BEAR invoice #2815980, received one day after the last date to invoice due to a late Form 498. This action is consistent with previous FCC precedent in the 2017 Ada Public Library Order (DA 17256) which dealt with late Form 498s, and the 2010 Academy of Math and Sciences Order FCC 10-122 that dealt with waivers granted by the FCC for actions taken within two weeks of the deadline. We ask that the FCC grant the appeal and/or waiver as appropriate and allow the Green Dot to reinvoice the BEAR reimbursement.

Actions Taken

Green Dot appealed the invoice denial to USAC on July 23, 2018 and was denied by USAC on September 11, 2018. Green Dot now appeals to the FCC for their action. Please see documentation attached.

Background

Green Dot Public Schools is a public charter school district primarily located in Los Angeles, California, serving disadvantaged students in the city's poorest neighborhoods. Their portfolio also includes administering schools in Memphis, TN, and Tacoma, WA. In 2016, Green Dot administered 18 schools in Los Angeles, four schools in Tennessee, and two schools in Washington State.

Green Dot Tennessee Consortium (BEN 17008913), like its counterpart in Washington State, Green Dot Washington Consortium (BEN 17015496) is an E-rate administrative entity that allows Green Dot Public Schools to file in EPC for schools it represents in states other than California (Tennessee and Washington State). The EPC system does not allow for Districts to represent schools in other states so the consortium entities were created to bridge that gap. As such, the district office is located in Los Angeles, CA and billing for the schools in Tennessee are handled by the District Office. Green Dot Public Schools filed a Form 498 in 2016 for direct BEAR payments. As an administrative entity, Green Dot Tennessee Consortium should have used the Form 498 from Green Dot Public Schools. However, the consortium entity was required to submit a new Form 498, which was submitted on the last date to invoice.

While the new Form 498 was approved the next day, and the BEAR invoice submitted the same day, the invoice was rejected for invoice received after last date to invoice. Had a new Form 498 not been required since this was an administrative entity, the BEAR would have been submitted prior to the last date to invoice. Thus, special circumstances exist and a granting of the appeal or a waiver of the invoicing deadline is warranted.

Action

Green Dot Public Schools ask that the appeal be granted or the invoicing deadline waived due to the special circumstances outlined above and allow Green Dot to receive reimbursement. We ask that an additional 120 days be granted to extend the invoicing deadline.

Sincerely,



Samantha Mita

Vice President of Technology

Green Dot Public Schools